Dear Secretary Theoharides:

On behalf of the Taunton River Watershed Alliance Inc. (TRWA), I am writing to urge you to waive the mandatory requirement for submission of an Environmental Impact Report (EIR) for the High Street Dam Removal and Bridge Replacement Project on the Town River in Bridgewater. This waiver would allow a project to proceed that is likely to yield significant environmental benefits, as described below.

The High Street Dam is the first significant barrier from the ocean on the Town River and Taunton River system. It impounds water for approximately two and a half miles upstream. As stated in the Environmental Notification Form for this project, this dam is classified as a “Significant Hazard Dam in fair condition which requires significant repairs.” It is located approximately one hundred feet downstream of the High Street “bridge” which is actually a river crossing comprised of four box culverts, each of which is less than four feet in width. The openings of the culverts are undersized to handle natural river flows, and the dam impoundment submerges the openings under almost all flow conditions. The bridge must be replaced prior to or concurrent with dam removal.

The dam also impacts recreational use of the river. It blocks passage of canoers and kayakers who must pull out of the river and relaunch several miles upstream.

With complete deconstruction and removal of the dam, approximately two hundred feet of river channel upstream would be restored to a stream that supports fish passage. The proposed project would reconnect ten miles of riverine habitat and restore spawning access to Lake Nippenicket. Water quality would improve as a result of the restoration of a free-flowing river. The proposed project would also eliminate the risk of dam failure.

Under the Massachusetts Environmental Policy Act, waivers of the requirement to submit an EIR can be granted if the project is likely to cause no damage to the environment. The proposed project design incorporates measures to minimize and avoid negative impacts.

In recent years, development of upland that borders the Town River (and other areas in the Taunton River watershed) has increased surface discharge and caused water levels to rise. Impacts of climate change also contribute to rising water levels, which in turn
exacerbate flooding and threaten public safety. Removal of the High Street Dam would help to mitigate these conditions. The ENF indicates that lowering water levels in the project area would increase flood storage capacity and allow for establishment of new bordering vegetated wetlands. In addition, permanent mitigation measures proposed for the project would include construction of stabilized riverbanks. Restoration of wetlands and reconstruction of riverbank would provide new habitat for local populations of reptiles, amphibians and birds.

TRWA believes that the significant potential benefits (described above) of the proposed dam removal, especially the restoration justify a waiver of the mandatory requirement for preparation of an EIR, which would allow the project to proceed as quickly as possible. We urge you to grant the waiver.

Thank you for considering these comments.

Truly yours,

Priscilla A. Chapman
President